

RUSTIN S. POLK  
Texas Bar No. 00784773  
POLK & ASSOCIATES  
214bankruptcy.com  
4514 Cole Ave., Suite 600  
Dallas, Texas 75205  
Telephone (214) 740-1160  
Telecopier (214) 572-7273

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	CASE NO. 09-38264
	§	
LIF ESMAEL MODABBERI	§	CHAPTER 13
	§	

**DEBTORS' RESPONSE TO**  
**TRUSTEE'S NOTICE OF INTENT**  
**TO CERTIFY CHAPTER 13 CASE FOR DISMISSAL**

**COMES NOW** the Debtor above-named, through counsel, in response to the Trustee's Notice of Intent to Certify Chapter 13 case for Dismissal filed herein and respectfully show the Court:

1. The Debtor originally filed this case pro se.
2. The Debtor, on 2/25/2010, retained the law firm Polk & Associates to represent him in the above-captioned case and are getting all the information together for the Trustee.

**THEREFORE**, the Debtor request that the Trustee's Notice of Intent to Certify Chapter 13 case for Dismissal be denied.

Respectfully submitted,

/s/ Rustin Polk  
RUSTIN S. POLK  
Texas Bar No. 00784773  
POLK & ASSOCIATES  
214bankruptcy.com  
4514 Cole Ave., Suite 600  
Dallas, Texas 75205  
Telephone (214) 740-1160  
Telecopier (214) 572-7273  
ATTORNEY FOR DEBTORS

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served on all parties as indicated on February 26, 2010.

/s/ Rustin Polk

**Debtors:**

Lif Esmael Madabberi  
3883 Turtle Creek Blvd., #2010  
Dallas, TX 75219  
*via ecf and USPS*

**Bankruptcy Trustee:**

Tom Powers  
Standing Chapter 13 Trustee  
125 E. John Carpenter, Ste 1100  
Irving, TX 75062  
*via ecf*

**US Trustee:**

William Neary  
Office of the US Trustee  
1100 Commerce, Rm 9C60  
Dallas, TX 75242  
*via ecf*

**All Parties Requesting Notice**

*via ecf or usps first class*